

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LA UNIÓN DEL PUEBLO ENTERO,
FRIENDSHIP WEST BAPTIST
CHURCH, THE ANTI-DEFAMATION
LEAGUE AUSTIN, SOUTHWEST, AND
TEXOMA REGIONS, SOUTHWEST
VOTER REGISTRATION EDUCATION
PROJECT, TEXAS IMPACT, MEXICAN
AMERICAN BAR ASSOCIATION OF
TEXAS, TEXAS HISPANICS
ORGANIZED FOR POLITICAL
EDUCATION, JOLT ACTION,
WILLIAM C. VELASQUEZ INSTITUTE,
FIEL HOUSTON INC., and JAMES
LEWIN,**

Plaintiffs,

Case No. 5:21-cv-844-XR

v.

**THE STATE OF TEXAS, JOHN B.
SCOTT, in his official capacity as the
Texas Secretary of State, WARREN K.
PAXTON, in his official capacity as the
Texas Attorney General, MICHAEL
SCARPELLO, in his official capacity as
the Dallas County Elections
Administrator, and LISA WISE, in her
official capacity as the El Paso County
Elections Administrator,**

Defendants.

MOTION FOR ADMISSION *PRO HAC VICE* OF LEAH J. TULIN

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Leah J. Tulin, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Plaintiffs Friendship-West Baptist Church, Texas Impact, and James Lewin in this case, and would respectfully show the Court as follows:

1. I am an attorney and a member of the law firm Brennan Center for Justice at NYU

School of Law with offices at:

1140 Connecticut Avenue NW
 11th Floor, Suite 1150
 Washington, DC 20036
 Telephone: (202) 650-6397

2. Since December 18, 2008, I have been and presently am a member of and in good standing with the Bar of the State of Maryland. My Maryland bar license number is 0812180236. Since October 4, 2010, I have been and presently am a member of and in good standing with the Bar of the District of Columbia. My DC bar license number is 98803.

3. I have been admitted to practice before the following courts:

Court of Admission	Date of Admission
U.S. District Court for the District of Columbia	07/22/2009
U.S. District Court for the Eastern District of Wisconsin	09/08/2010
U.S. Supreme Court	06/19/2017
U.S. District Court for the District of Maryland	07/28/2017
U.S. Court of Appeals for the Fourth Circuit	10/13/2017

4. I am presently a member in good standing of the bar of the courts listed above.
5. I have not previously applied to appear *pro hac vice* in this District Court.
6. I have never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.
7. I have not been charged, arrested, or convicted of a criminal offense or offenses.
8. I have read and am familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

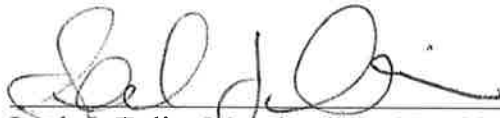
9. I will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or I have co-counsel in this case who is admitted to practice before the U.S. District Court for the Western District of Texas:

Sean Morales-Doyle
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8363

Should the Court grant applicant's motion, I shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2), made payable to: Clerk, U.S. District Court.

Wherefore, I pray that this Court enter an order permitting the admission of Leah J. Tulin to the Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,



Leah J. Tulin, Maryland Bar No. 0812180236
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
1140 Connecticut Avenue NW, Suite 1150
Washington, DC 20036
Telephone: (202) 650-6397

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 31st day of May, 2023.



Leah J. Tulin